

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
(Central Division)

_____	)	
In re:	)	
	)	Chapter 7
CHANRANY EM	)	
	)	Case No. 12-41149-MSH
Debtor	)	
_____	)	

**DEBTOR'S MOTION TO REOPEN CHAPTER 7  
FOR PURPOSE OF OBTAINING DISCHARGE**

Chanrany Em ("Em") hereby moves, pursuant to 11 U.S.C. § 350(b) and Fed. R. Bankr. P. 5010, to reopen her Chapter 7 case for the purpose of obtaining her discharge under 11 U.S.C. § 727. In support of this Motion Em states as follows:

1. On March 29, 2012 Em filed a voluntary petition under Chapter 7 of the Bankruptcy Code with this Court.
2. On August 2, 2012 this Court closed Em's case without a discharge because a Debtor's Certification of Completion of Instructional Course Concerning Personal Financial Management had not been filed [Docket No. 58].
3. Em, who does not speak English, believed that she had done what was necessary to obtain her discharge back in 2012, and understood from her prior counsel that, when her bankruptcy closed, she had received her discharge.
4. Within the last few weeks, however, Em applied for a mortgage in connection with the planned purchase of a new home, whereupon she learned for the first time that she had never received her 2012 Chapter 7 discharge. This is preventing her from qualifying for a home mortgage.

5. Accordingly, in order to provide Em an opportunity to take the personal financial management course, file the requisite certification, and obtain her discharge, she hereby requests that this Court reopen her Chapter 7 bankruptcy case.

6. A copy of this Motion has been furnished to: (a) the Office of the United States Trustee for this district; (b) Em's prior bankruptcy counsel; (c) all parties that have requested notice and service of pleadings in this case; and (d) all creditors in the creditor matrix filed in this case. Em requests that this Court find such service to be appropriate and sufficient notice of this Motion in the particular circumstances.

WHEREFORE, Em requests that this Court: (i) approve this Motion to reopen her Chapter 7 bankruptcy case; and (ii) grant such other and further relief as this Court may deem just and proper.

Respectfully submitted this 21st day of November, 2016.

CHANRANY EM,

By her attorney,

/s/ Nathan R. Soucy  
Nathan R. Soucy (BBO # 660914)  
SOUCY LAW OFFICE  
375 Gorham Street  
Lowell, Mass. 01852  
Telephone: (978) 905-8010  
Facsimile: (978) 455-3323  
Email: *nsoucy@soucylo.com*

**CERTIFICATE OF SERVICE**

I, Nathan R. Soucy, hereby certify that on November 21, 2016, I caused copies of the foregoing *Debtor's Motion to Reopen Chapter 7 for Purpose of Obtaining Discharge* to be served on the parties listed below by the Court's ECF system or by first class mail, postage prepaid.

/s/ Nathan R. Soucy

Richard King  
United States Trustee  
*USTPRegion01.WO.ECF@USDOJ.GOV*

Financial Recovery Services  
PO Box 385908  
Minneapolis, MN 55438

Todd S. Dion, Esq.  
Former Counsel to the Debtor  
*toddsdion@msn.com*

TD Bank North  
PO Box 8400  
Lewiston, ME 04243

Peter A. Lawton, Esq.  
Counsel to Mortgagee U.S. Bank National  
Association  
Marinosci Law Group P.C.  
1350 Division Rd Ste 301,  
West Warwick, RI, 02893

Portfolio Investments II LLC  
Attn: Ramesh Singh  
c/o Recovery Management Systems Corp.  
25 SE 2nd Ave Ste 1120  
Miami, FL 33131-1605

Atlas Acquisitions LLC  
Attn: Avi Schild  
294 Union St  
Hackensack, NJ 07601

AHMSI  
4875 Belfort Road  
Jacksonville, FL 32256

BSI Financial Services  
PO Box 517  
Titusville, PA 16354

Chase  
PO Box 15153  
Wilmington, DE 19886

Discover Cardservices  
PO Box 3008  
New Albany, OH 43054